

December 8, 2015

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Presentation; Comprehensive Review of Licensing and Operating Rules for
Satellite Services, IB Docket No. 12-267

Dear Ms. Dortch:

JSAT International ("JSAT"), in accordance with Section 1.1206 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 1.1206, files this letter to express its views regarding the FCC's two-degree spacing policy under consideration in the above-referenced proceeding.

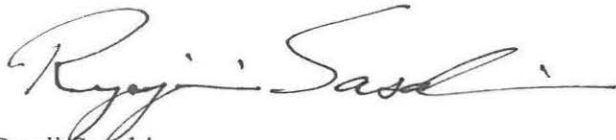
JSAT understands that as a foreign-licensed satellite operator with U.S. market access, it is subject to the Commission's two-degree rules. However, JSAT is concerned about how those rules today do not protect long-standing, previously coordinated, operations. Under the current rules, an operator that has been able to successfully coordinate better-than-two-degree levels with neighboring operators may find that such coordination agreements fail to protect existing services if the neighboring operators change. This is because the new neighboring operator may opt to use a new ITU filing as a basis for its operation, and therefore is not obliged to honor previous coordination agreements. The new neighboring operator can then invoke the two-degree levels, completely disregarding the existing coordination agreements that the incumbent operator may have signed with the previous neighboring operator. This means that existing operators can never really ensure the protection of services provided pursuant to earlier agreed upon operational levels.

JSAT fully realizes that globalization of the satellite industry may have created operational scenarios that were not envisaged when the rules were created and commends the Commission for re-examining the two-degree rules in light of these scenarios.

JSAT submits that the public interest is not served when satellite operators serving the U.S. cannot rely on operational levels previously coordinated in good faith. JSAT therefore urges the Commission to revise the two-degree rules to ensure that an operator with U.S. market access (or a U.S. license) can operate at earlier coordinated levels – regardless of the Administration with whom those levels previously were coordinated – with respect to any later-in-time operator.

Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryuji Sasaki". The signature is fluid and cursive, with the first name "Ryuji" and last name "Sasaki" clearly distinguishable.

Ryuji Sasaki
President & COO
JSAT International Inc.
1401 H Street NW, Suite 220
Washington, DC 20005

cc: Jose Albuquerque
Phil Verveer
Diane Cornell
Nicholas Degani